

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Harish Ramesh

Case: 2:23-mj-30226

Assigned To : Unassigned

Case No. Assign. Date : 6/1/2023

Description: RE: HARISH RAMESH
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2022 through May 31, 2023 in the county of Oakland and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*18 U.S.C. § 2252A(a)(2)
18 U.S.C. § 2252A(a)(5)(B)*Offense Description*Receipt of child pornography
Possession of and/or access with intent to view child pornography, or attempt
to possess or access with intent to view child pornography

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: June 1, 2023City and state: Detroit, Michigan
Complainant's signatureAmy M. Hirina, Special Agent (FBI)
Printed name and title
Judge's signatureHon. David R. Grand, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, Amy M. Hirina, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the FBI since 2005, and am currently assigned to the FBI Detroit Division, Oakland County Resident Agency. While employed by the FBI, I have investigated federal criminal violations involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post-Academy training, and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute arrest warrants issued under the authority of the United States.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for HARISH RAMESH (DOB XX/XX/2003) for violation of 18 U.S.C. § 2252A(a)(2) (receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of and/or access with intent to view child pornography, or attempt to possess or access with intent to view child pornography).

SUMMARY OF PROBABLE CAUSE

4. The Federal Bureau of Investigation is investigating Instagram user neogenesis*****, who is associated with a group of individuals producing, receiving/distributing, and possessing child pornography on the Instagram platform. The users refer to themselves as MAPs¹ and specifically discuss a minor female livestreaming naked, which one member stated s/he recorded. The IP addresses used to access the neogenesis***** Instagram account resolved to RAMESH's residence in Troy, Michigan. On May 31, 2023, a search warrant was executed at RAMESH's residence, and RAMESH voluntarily spoke with agents and made admissions.

PROBABLE CAUSE

5. On or about February 1, 2023, the National Center for Missing and Exploited Children (NCMEC²) received a CyberTipLine report from Instagram regarding a 17-year-old male (Instagram user "sneep****") who appeared to be enticing a 13-year-old female (MV-1) to produce and distribute child sexual abuse material (CSAM). Sneep*** and other individuals, including a user named neogenesis*****, were all in a group chat on Instagram that included a live

¹ MAP: an internet search defines MAP as a 'Minor-Attracted-Person'.

² The National Center for Missing and Exploited Children (NCMEC) was established in 1984 as a private, non-profit organization. NCMEC provides services nationwide for families and professionals in the prevention of abducted, endangered, and sexually exploited children. Pursuant to its mission and its congressional authorization, NCMEC operates the CyberTipLine, a forum for private citizens and businesses to report information related to the mission of the NCMEC, including the sexual exploitation of children.

broadcast by MV-1 wherein she engaged in sexually explicit conduct.

6. On March 8, 2023, a search warrant seeking information for Instagram account neogenesis***** was issued by U.S. Magistrate Judge Anthony P. Patti in the U.S. District Court for the Eastern District of Michigan.

7. I reviewed the contents of the neogenesis***** account. It included conversations about the livestream with MV-1, which occurred in December 2022. I believe that the contents of the livestream, if they were available, would meet the federal definition of child pornography, especially because a single screenshot of that livestream does exist. A screenshot of the livestream with MV-1 was posted in the group chat. The screenshot of MV-1 meets the federal definition of child pornography. Instagram user Sneep*** stated he got a lot of the livestream on video to rewatch and neogenesis***** asked where they can post the video. Further, it included a request made to MV-1 by neogenesis***** to send a nude. The members of the group, including neogenesis*****, acknowledge that they believe that she is 13 years old during the livestream. MV-1 has not been fully identified but Meta has provided information based off social contacts that MV-1 appears to be an actual 13-year-old. MV-1 also acknowledged that she was 13 in a separate chat with another member of the group.

8. The IP address information for neogenesis***** provided by the NCMEC tip associated the account with an address in Troy, Michigan. That same residence was associated with HARISH RAMESH and based upon statements by the neogenesis***** user, I believed RAMESH to be the individual who viewed the livestream of sexually explicit conduct by MV-1 and also was in an Instagram group chat when another individual posted a sexually explicit image of MV-1.

9. On May 31, 2023, a search warrant was executed at RAMESH's residence in Troy, Michigan. RAMESH was departing the residence and encountered law enforcement at the time of execution. RAMESH agreed to be interviewed at the FBI Oakland County Resident Agency office. RAMESH provided his Instagram username as neogenesis*****. RAMESH stated he viewed a 13-year-old female on Instagram who was livestreaming naked. RAMESH asked the 13-year-old female to send him nudes and she sent RAMESH approximately five nude images. RAMESH also admitted that he has downloaded nude images of two 15-year-old females from a Discord group.

CONCLUSION

10. Based on the Instagram conversations observed on RAMESH's Instagram account neogenesis*****, and RAMESH's admissions, I believe that probable cause exists that HARISH RAMESH (DOB XX/XX/2003) violated 18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B) (receipt and possession of and/or access

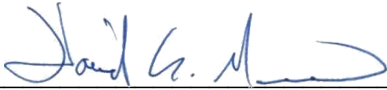
with intent to view child pornography, or attempt to possess or access with intent to view child pornography).

Respectfully submitted,



Amy M. Hirina, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. David R. Grand
United States Magistrate Judge

Date: June 1, 2023